

W.K., et al v. Red Roof Inns, Inc., et al

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B.,)
D.P., A.F., C.A., R.K., K.P.,)
and T.H.,)
Plaintiffs,)

PL Sum. J.
Ex. 022

V.) CIVIL ACTION NO:
) 1:20-CV-05263-VMC
)

RED ROOF INNS, INC., et al.,)
Defendants.)

* * * * *
JANE DOE 1-4,)
Plaintiffs,)

V.) CIVIL ACTION NO.
) 1:21-CV-04278-WMR
)

RED ROOF INNS, INC., et al.,)
Defendants.)

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VIDEOTAPED ORAL DEPOSITION OF

████████████████████
Taken May 6, 2022

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VIDEOTAPED ORAL DEPOSITION OF ██████████

██████████, produced as a witness at the instance of
the Defendant Red Roof Inns, and duly sworn, taken
in the above-styled and numbered cause on May 6,
2022, from 9:13 a.m. to 7:45 p.m., before Julie
Greene, CSR No. 2847, in and for the State of
Texas, reported by machine shorthand method at the
offices of The Turley Law Firm, 6440 N. Central
Expressway, 10th Floor, Dallas, Texas, pursuant to
the Federal Rules of Civil Procedure.

Job Number: 5213695

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ALSO PRESENT (attending remotely):

Ms. Beth Richardson

THE VIDEOGRAPHER:

Mr. Norm Harris

1 your relatives or anything like that?

2 A. Yes.

3 Q. Okay. And who does she know?

4 A. She knows my mom and my dad and my three
5 brothers.

6 Q. And we'll talk about your family in just a
7 little bit. And did she know them since high
8 school when you-all were friends?

9 A. Yes.

10 Q. Okay. We'll flip to the next page. The
11 next -- The next person disclosed here is [REDACTED]
12 [REDACTED] or Bless; is that correct?

13 A. Yes.

14 Q. And Bless was one of your alleged
15 traffickers, right?

16 A. Yes.

17 Q. Now, you've had -- You allege to have been
18 trafficked between 2009 and 2013; is that correct?

19 A. As far as I can remember, yes.

20 Q. Okay. And do you remember that, or you're
21 just kind of guessing the timeline?

22 A. As far as the timeline beginning, I'm
23 unsure if it was 2009 or 2010.

24 Q. Okay. And we'll talk a little bit more
25 about that. But let me just -- So whether it's

1 2009 or 2010 through 2013, you've had three people
2 that you allege trafficked you, correct?

3 A. Yes.

4 Q. And one of them is Bless, right?

5 A. Yes.

6 Q. And then I'm sure we'll come to the other
7 name, but I'm just going to state them for the
8 record real quick. The other person that initially
9 got you started in this life, right, his name was
10 Lee -- [REDACTED] or [REDACTED] or --

11 A. One of his names, he was known as Base
12 Cleff.

13 Q. [REDACTED]. Was that his nickname or
14 his --

15 A. I guess. I'm not sure.

16 Q. And the other one was Bagz, right, [REDACTED]
17 [REDACTED]?

18 A. Yes.

19 Q. And those are the only three people that
20 allegedly trafficked you, correct?

21 A. Yes.

22 Q. How do you know Bless's name is [REDACTED]
23 [REDACTED], real name?

24 A. From Facebook. That's what his name was
25 on Facebook.

1 crazy or something or...

2 A. I honestly do not know.

3 Q. And do you know -- Do you know his real
4 name?

5 A. No.

6 Q. And he was also one of the -- It says here
7 he was also an associate of -- And when you say "an
8 associate of the traffickers," are you referring to
9 Bless or Bagz?

10 A. Both.

11 Q. Okay. Was he an associate of [REDACTED]?

12 A. No.

13 Q. And -- But he wasn't one of your
14 traffickers, right?

15 A. No.

16 Q. "No" meaning he was not one of your
17 traffickers, correct?

18 A. Not one of mine, no.

19 Q. The next -- Can you describe Kuuk?

20 A. We weren't really allowed to look at them
21 very much. If they were around, we had to keep our
22 heads down. So the best I could say is that he was
23 a black man, and I think he was tall and thin.

24 Q. Do you recall how old he may have been at
25 the time?

1 Q. And what's your relationship like with
2 your grandparents, [REDACTED] and [REDACTED]?

3 A. It's wonderful.

4 Q. Okay. Was it wonderful the entire time,
5 --

6 A. No.

7 Q. -- since you were a child?

8 A. I think it was typical when I was a child,
9 typical grandparent relationship. And then it was
10 kind of nonexistent for a while, and now it's
11 great.

12 Q. And when was it nonexistent?

13 A. When I was in Georgia.

14 Q. And that's during your alleged
15 trafficking?

16 A. Yes.

17 Q. Did they know about that?

18 A. No.

19 Q. And why -- How did you went from being a
20 wonderful relation to no relationship and -- Tell
21 me that.

22 A. It went from being a typical
23 relationship --

24 Q. Typical.

25 A. -- to a nonexistent relationship. I

1 just -- When I moved to Georgia and I was with
2 Bagz, I -- I had already thought that my family was
3 better off without me, and Bagz played on that and
4 manipulated my mind to making me think that they
5 truly did not want anything to do with me, so I did
6 not have a relationship with my family.

7 Q. Okay. And so it was basically your choice
8 to cut them off, right?

9 A. No.

10 MS. MYKKELTVEDT: Object to the form.
11 Go ahead.

12 THE WITNESS: No. It was not my
13 choice. I was manipulated into thinking that they
14 wanted nothing to do with me.

15 Q. (By Mr. Allushi) I understand that. But
16 you cut them off, right? You were the one -- I
17 understand you're saying you were manipulated, but
18 you cut them off, right?

19 A. I was also not allowed to make phone calls
20 to my family unless I had permission, and he was
21 right there listening to the phone calls.

22 Q. And how long were the phone calls usually?

23 A. Not very long.

24 Q. And when you say "not very long," more
25 than five minutes, less than ten minutes?

1 Q. Okay. Tell me about it.

2 A. I just simply don't believe the things I
3 used to believe as a religious person.

4 Q. Okay. You believe in God?

5 A. In a way, yes.

6 Q. Okay. Well, let me ask you this: What
7 triggered the change from a religious person to a
8 nonreligious person?

9 A. I believe a number of things did. One --
10 One thing I see a lot of in Christian groups and
11 religious groups is women are treated more as more
12 second -- like second class, you know. We're
13 supposed to be submissive to men. And Bagz would
14 often use the Bible to try to manipulate us into
15 being submissive. And I noticed that a lot of men
16 in Christian religion do that, as well. So that's
17 one reason among many more.

18 Q. And what are some of the other reasons?

19 A. Just freedom of spirituality, also. Not
20 necessarily having to follow, I guess, a book to be
21 spiritual.

22 Q. And when did this triggered event occur?
23 When were you like -- When did you decide that you
24 weren't going to be a believer in Christianity
25 anymore?

1 media?

2 A. Not that I can recall.

3 Q. And what about your dad, [REDACTED]? Did you
4 speak to him throughout your alleged trafficking?

5 A. I did, but there was a certain point where
6 I wasn't allowed to speak to him anymore.

7 Q. Okay. And why is that?

8 A. There was a time where I was talking to my
9 dad, and I called him Daddy. And I got in trouble
10 for that, and I wasn't allowed to speak to him
11 anymore.

12 Q. And you got in trouble from?

13 A. Bagz.

14 Q. With Bagz or Bless?

15 A. Bagz heard me call him that, and he didn't
16 like it, so he made it where I couldn't call him
17 anymore.

18 Q. And during the entire time that you
19 were -- well, strike that. I'll ask you that in a
20 second.

21 And do you still have a relationship
22 with your mother, [REDACTED]?

23 A. Yes.

24 Q. Is it a good one?

25 A. Yes.

1 in it.

2 Q. And with an ad, you mean like an ad
3 advertising the sale of sex?

4 A. Yes.

5 Q. And so then he sent somebody to get you?

6 A. Yes.

7 Q. Who?

8 A. A friend. I can't remember who came to
9 get me. I can't remember who it was.

10 Q. And do you remember when that was?

11 A. I don't.

12 Q. Okay. And so -- And we'll talk about that
13 in a little bit. Was he mad? Was [REDACTED] mad at
14 what was going on, what you were doing?

15 A. He was heartbroken.

16 Q. Okay. And you said you stayed with him
17 for some time, and that's when you left and went to
18 [REDACTED]?

19 A. Yes.

20 Q. And that's the episode where Bless bought
21 you-all tickets and flew to Georgia, right?

22 A. Yes.

23 Q. And you have put in your interrogatories
24 that that was in 2009, right?

25 A. That's what I believed.

1 Q. Okay. Did you -- Did you tell [REDACTED],
2 hey, come to Georgia with me, I've got this guy and
3 he's going to take care of us?

4 A. Yes. She was right there with me reading
5 the messages as they came and -- came and went.
6 She was right there at her computer.

7 Q. How many messages did you-all -- did
8 you-all exchange?

9 A. I honestly don't know.

10 Q. It was more than one, though, right?

11 A. Yeah. It was a little bit back and forth.

12 Q. And so it's sometime September 2010, and
13 you were exchanging the messages. And then did he
14 send you guys tickets; do you recall?

15 A. Yes.

16 Q. Plane tickets?

17 A. That's also part of why we bought into the
18 illusion of this rich rapper, because he said, you
19 know, I've got it, I'll buy y'all's tickets and fly
20 y'all out here. He just made it seem, you know,
21 like this baller, this rich rapper-style guy, and
22 it was easy for our young naive brains to buy into
23 it, I guess.

24 Q. And Bless didn't force you to get on the
25 plane and go to Georgia, right?

1 A. He definitely manipulated us into getting
2 on those planes.

3 MR. ALLUSHI: Objection,
4 nonresponsiveness.

5 Q. (By Mr. Allushi) Did Bless force you to
6 get in a plane to come to Georgia? You can answer
7 with a yes or no, and then explain whichever way
8 you'd like, [REDACTED].

9 A. No. He didn't physically force us to get
10 on a plane, but he definitely used manipulation of
11 our minds to get us on there. Had we known what we
12 were flying to, we would not have gone.

13 Q. Okay. And when you say manipulative,
14 you're talking about promising you the life, right?

15 A. Yes.

16 Q. The luxury life?

17 A. Yes.

18 Q. He didn't coerce you in any way? He
19 didn't say I'm going to kill your little brother if
20 you don't come to Georgia, right?

21 A. No. He did not use any kind of
22 threatening language at the time.

23 Q. Okay. So then you get -- you get to
24 Georgia, and I guess -- Was it September, or was it
25 October by that time, 2010?

1 A. I think I was watching like YouTube videos
2 about conspiracy theories and stuff like that.

3 Q. Was that Pizzagate?

4 A. Yes.

5 Q. Okay.

6 A. That was some of it, yes.

7 Q. Okay. We'll talk about that in a little
8 bit. But -- So at the time, I guess, he didn't use
9 the word trafficking, right? So he came in and --
10 Bless came in and just basically said that you-all
11 were going to have sex for money, right?

12 A. Yeah, more or less. He didn't say that
13 exactly, and I honestly can't remember what he told
14 us. The whole situation, it was just very dark,
15 very scary, nothing like what we expected, and it
16 was terrifying.

17 Q. Okay.

18 A. I don't know how else to explain. It
19 wasn't anything like what we expected.

20 Q. Why was it scary at this time? He hadn't
21 done anything by this time, right? You'd just got
22 to the hotel.

23 A. Yeah. But we were expecting a certain
24 situation, and next thing we know we're at a dingy
25 hotel with really sketchy people, and not to

1 mention [REDACTED] looked, like, miserable, and it
2 just -- it was not -- it was -- we were young,
3 young small females, and it was just not -- it
4 didn't feel like a safe situation to be in.

5 Q. Okay. So he said you-all are going to,
6 not in specific words, but you understood at the
7 time that you were going to have sex for money?

8 A. We --

9 Q. Go ahead.

10 A. I'm sorry. We were -- We understood at
11 that time that we were expected -- that we were
12 going to have sex for money for him.

13 Q. And you had done that before, though, with
14 Lee, right?

15 A. Yes, briefly.

16 Q. Okay. But [REDACTED] had never done that
17 before, right?

18 A. Not to my knowledge, no.

19 Q. Okay. Was [REDACTED] shocked? I mean, was
20 she, like, what the hell's going on here?

21 A. Yes.

22 Q. And -- But you had done it before, right,
23 so you kind of knew what was going down, right?

24 A. Well, I didn't know -- I didn't know that
25 that's what I was going to be doing prior to this,

1 no.

2 Q. When you learned it was my question.

3 A. Yes. But I didn't agree to it.

4 Q. Okay. Did you tell Bless no, I don't want
5 to do this, I'm going to leave?

6 A. No. I did not. I was too scared to say
7 that. And then not much longer after that, he took
8 [REDACTED] into the bathroom of the hotel and, like,
9 beat the crap out of her. It was very, very loud
10 and like it was at that point the most terrifying
11 thing I'd ever heard. And that was enough to scare
12 us into submission.

13 Q. But when he said and you understood -- You
14 said after he had already explained what y'all were
15 going to do is when he beat [REDACTED], right?

16 A. I can't remember if it was the exact same
17 day or before or after. I just remember it was
18 right there in that time, in that timeframe.

19 Q. So when he told you that you were going to
20 have commercial sex, did you say -- I know you said
21 you didn't say no to him, but did he threaten you
22 in any way?

23 A. I don't -- I don't know if he did in the
24 very beginning. But like I said, the violent
25 situation with [REDACTED] was very early on, and that

1 Bless.

2 Q. The two Extended Stays?

3 A. Yes.

4 Q. Okay. And during those two weeks that
5 you-all switched between these two hotels, was --
6 was Bless ever violent during those first two
7 weeks?

8 A. Yes.

9 Q. When did he start being violent with you?

10 A. Well, he wasn't violent with me. He was
11 extremely violent with [REDACTED].

12 Q. And who -- Are you speaking of [REDACTED]
13 [REDACTED] or --

14 A. No. The [REDACTED] that's in that photo.

15 Q. Photograph?

16 A. Yes. I don't know her last name.

17 Q. And was he ever violent with you during
18 those two weeks?

19 A. No, not yet.

20 Q. Okay. Did he ever threaten you during
21 those two weeks?

22 A. Yes.

23 Q. Saying what?

24 A. Just that he'd beat the crap out of me and
25 just -- just a very aggressive overall way of

1 Q. So even back then you didn't ask for help,
2 right?

3 A. No.

4 Q. How long were you with Bless?

5 A. I would say probably under two months.

6 Q. And did you ever stay with Bless at the
7 North Druid Hills location?

8 A. I don't believe so, no.

9 Q. And then you met Bagz, right?

10 A. Yes.

11 Q. And how did you meet Bagz?

12 A. Well, the first time I met Bagz, we were
13 actually outside of -- We were in a van, and me and
14 [REDACTED] were in the back, and we had gone to pick up
15 Bagz. And we were outside of that Hilton hotel
16 that I can't remember the name of it, and that's
17 the first time I met Bagz, and he turned around and
18 introduced himself.

19 And I had -- I remember, because I had
20 gotten in a lot of trouble with Bless for that,
21 because I was not supposed to be looking anyone in
22 the -- especially any other pimp in the eye, let
23 alone touching them and talking to them; so...

24 Q. Did you ever have sex with Bless?

25 A. Yes.

1 Q. Was it the first night you got to Georgia?

2 A. I don't think so.

3 Q. It was at some time during those couple
4 weeks you were with him, right?

5 A. Yes.

6 Q. How many times did you have sex with him?

7 A. I'm not sure. Not many.

8 Q. Did he force you to have sex?

9 A. No. But it was understood that when you
10 were a pimp's girl, you were basically their
11 property, and it was -- You were -- You had to have
12 sex with them if that's what they wanted.

13 Q. Did you ever have a threesome with him and
14 you and [REDACTED]?

15 A. No. I don't think so.

16 Q. Did you ever have any -- Do you know if
17 [REDACTED] had sex with him or not?

18 A. I don't think so.

19 Q. You don't think you know, or you don't
20 think she had sex with him?

21 A. I don't think she had sex with him.

22 Q. Do you think she ever performed oral sex
23 on him?

24 A. I don't believe so.

25 Q. You never witnessed Bless performing -- or

1 that's when me and [REDACTED] were sitting behind
2 Bless, and we were supposed to keep our heads down,
3 and I had just learned that. And then I guess a
4 few hours later, I remember Bagz's girls, [REDACTED]
5 and [REDACTED], who those were his girls at the time,
6 came in and gave him big wads of cash, and they
7 seemed really happy and happy to see him, meaning
8 Bagz. And he was, like, expressing, you know, what
9 seemed like gratitude to them, like -- like -- or
10 telling them that they did a good job and all that,
11 and so I just remember that memory sticking out in
12 my mind.

13 Q. And you say that you went to this music
14 studio, right?

15 A. Yes.

16 Q. Was that -- Was it PIVIP by then, or not?

17 A. It may have been.

18 Q. And what's PIVIP for the record stand for?

19 A. I believe it's called -- it stands for
20 Pimps In Very Important Places.

21 Q. Okay. And so what was that? What was
22 PiviP? Was it a gang?

23 A. I think they were trying to make a
24 music -- Like, have you ever heard of YMCMB?

25 Q. No

1 your own and letting the girls bring their own.

2 And it didn't happen very often, but -- And he
3 would act like that was a Bottom Bitch privilege.

4 Q. It's not like the Bottom Bitch could keep
5 the money, though, right?

6 A. No. Of course not.

7 Q. You still had to give it to Bagz?

8 A. Yes.

9 Q. Or the pimp -- whoever the pimp was?

10 A. Yes.

11 Q. And were you ever Bless's Bottom Bitch?

12 A. No.

13 Q. Were you at some time then later on Bagz's
14 Bottom Bitch?

15 A. Sorry. Could you repeat the question.

16 Q. Were you at some time during the alleged
17 trafficking with Bagz, Bagz's Bottom Bitch?

18 A. I was made to believe that, yes.

19 Q. Okay. And so you're on this trip. But in
20 October 2010, you were on this trip and the girls
21 are trying to convince you to switch to Bagz, and
22 so how did it happen, then? What happened? How
23 did you make the transition?

24 A. When we -- When all of the girls got back
25 to the hotel, Bagz's girls, I guess, told him that

1 I wanted to. And then the pimps lined up in the
2 hallway, and the girls basically -- I said what the
3 girls told me to say to Bagz. And, yeah, at that
4 time Bless was trying really hard to get me to
5 stay, and he was threatening me behind Bagz's back.
6 Bagz was here and Bless was here. And he was,
7 like, pulling out his gun and subtly pointing it at
8 me. And it was really scary, but all I could think
9 at that time was I have to get away from him. And
10 it felt like Bagz was my escape at the time and a
11 better situation.

12 Q. Okay. So let me just understand this
13 right. So you're in Texas. You're in Dallas,
14 right? Near your home town, right?

15 A. Yes.

16 Q. And you're here with Bless, and Bagz is
17 there. And you think that switching to Bagz is the
18 safe thing to do versus, like, calling [REDACTED],
19 calling your dad, calling your mom, seeking help
20 from all these people that loved you all your life,
21 right?

22 A. Yes. I did think it was the better
23 option, because I did not know how I would even
24 explain the situation to my parents. I mean...

25 Q. But there was nothing stopping you from

1 doing that at the time, right? There was no
2 physical restraint, was there?

3 A. Just the intimidation and the fear.

4 Q. Psychological, right?

5 A. Yes.

6 Q. And was this like a ritual, what y'all
7 were doing in this hotel, like walking out to --
8 What did you do? You walked up to Bagz and you
9 said I choose up, I choose you, or something like
10 that?

11 A. Yeah. It does seem like a ritual, looking
12 back at it. It seems ritualistic. It was --
13 That's just the code of, like, pimps and their
14 girls, I guess.

15 Q. Which hotel was this at, [REDACTED]?

16 A. I'm not sure. I can't remember what hotel
17 we stayed in.

18 Q. Dallas?

19 A. Yes, in Dallas.

20 Q. Do you know if it was a La Quinta, or you
21 can't recall at all?

22 A. No. It was a nicer hotel. It was one of
23 the higher-end hotels.

24 Q. Like a Marriott, a Hyatt or something like
25 that?

1 A. Yeah. It was pretty tall, I remember,
2 because we were pretty high up.

3 Q. And you haven't sued that hotel, right?

4 A. I can't remember what hotel it was.

5 Q. But this was the hotel where your
6 transition from Bless to Bagz happened, right?

7 A. Yes.

8 Q. Important hotel, wouldn't you say?

9 A. Well, I mean, the hotel really wasn't that
10 important to me at the time.

11 Q. Well, did they -- Was this ritual inside a
12 room, or was it in the hallway?

13 A. It was in the hallway.

14 Q. So did any of the employees see you guys
15 do this thing?

16 A. I'm not sure.

17 Q. Okay. Should they have seen you? I mean,
18 you're doing a ritual, pimps lined up and the girls
19 as you described them lined up, right?

20 A. It was just me.

21 Q. Okay. It was just you, Bagz, and Bless?

22 A. And I believe Kuuk and Nitty were also
23 lined up outside.

24 Q. So should the hotel have seen and done
25 something about it, saved you?

1 A. If there were cameras, they should have
2 seen and, yes, I do feel like they should have
3 stepped in or at least called the cops, because the
4 situation was very sketchy.

5 Q. And that was a bigger hotel, right? It
6 wasn't like the motels like Red Roof or Suburban
7 Extended Stay or those places, right?

8 A. No. It wasn't. It was a nicer hotel.

9 Q. Do you know if they had inhouse security?
10 Big hotels usually have inhouse security.

11 A. They may have.

12 Q. Okay. And so you're in -- So then you
13 went with Bagz, right? After you said choose up,
14 that was it, right? You went with Bagz?

15 A. Yes.

16 Q. And how long were you-all -- Were you
17 having sex for money at that hotel where you chose
18 up Bagz?

19 A. I don't believe so.

20 Q. How long were you-all at that hotel?

21 A. It was brief. This whole visit was really
22 random to me at the time. Looking back now, I
23 almost feel like it was -- they were on a mission.
24 The pimps were on a mission of some sort.

25 Q. What mission was that?

1 A. I believe they were trying to find [REDACTED]
2 again.

3 Q. Did they?

4 A. No. I don't think so.

5 Q. You didn't bring [REDACTED] back, or [REDACTED]
6 didn't come back with you on this trip, right?

7 A. I'm not sure. I don't believe she came
8 back on this trip specifically, but she did come
9 back pretty -- pretty soon after I started being
10 with Bagz.

11 Q. And how did that happen; do you remember?

12 A. I don't remember. I don't remember.

13 Q. So you were with Bagz from October 2010
14 until the end of your alleged trafficking, right,
15 2013 when you went to jail, prison?

16 A. Yes.

17 Q. When did you go to prison? Was it --

18 A. It was in March of 2013. I got arrested
19 in Texas, actually, because I was violating
20 probation by being out of the state without
21 permission.

22 Q. And we'll talk a little bit about the
23 arrest, [REDACTED]. Let me just try to
24 understand. So from -- So Bagz, you were allegedly
25 trafficked from October 2010 through March 2013,

1 right?

2 A. Yes.

3 Q. That's two and half years roughly?

4 A. Yes.

5 Q. And so you got back to Georgia shortly
6 thereafter the whole choose up hotel thing?

7 A. I believe so.

8 Q. Did you go into any other states?

9 A. I think we stopped in some states on the
10 way back to Georgia. I just cannot remember. But
11 I feel like I remember stopping in some states, but
12 I don't know which ones. Probably Louisiana.

13 Q. Did Bless ever take you out of state?

14 A. This visit. Just this visit to -- going
15 to Dallas.

16 Q. And on the way, did you-all stop to have
17 commercial sex anywhere on the way?

18 A. It's possible, but I don't -- I don't
19 remember.

20 Q. And which states did Bagz allegedly
21 traffic you aside from Georgia?

22 A. We -- Louisiana. North Carolina and South
23 Carolina. Tennessee. Alabama. Florida. And
24 Texas. And I think that's it. I mean, if I were
25 shown a map, I might be able to...

1 Q. Seven states, that is, you named, right?

2 A. (Witness nods head.)

3 Q. And did you stay at hotels at all these
4 places?

5 A. Yes.

6 Q. And is there any other brands we haven't
7 mentioned that you stayed at these -- during your
8 alleged trafficking in these other states?

9 A. When we went to, I'm not sure if it was
10 North Carolina or South Carolina, we would stay at
11 a DoubleTree. But Extended Stays were also very
12 popular. Red Roof Inns while we were out of town
13 were less popular, because I think we only stayed
14 at ones that Bagz had established to be safe from
15 the police and that he was visibly comfortable, you
16 know, parading us around at.

17 Q. Do you remember any other Red Roofs out of
18 state that you stayed at?

19 A. I feel like there was maybe one, I think,
20 in Tennessee.

21 Q. Do you remember what city or where, which
22 area?

23 A. I'm not sure.

24 Q. And the DoubleTree hotel you said in the
25 Carolinas, have you sued the DoubleTree hotel?

1 A. No.

2 Q. So you get back to Georgia with Bagz,
3 right?

4 A. Eventually, yes.

5 Q. And so we are -- October 2010. When do
6 you think you got back to Georgia from that trip?

7 A. When we went on these trips, they were
8 really -- they were usually about a week or two,
9 maybe sometimes three weeks long, so maybe the end
10 of October or so, November, maybe the beginning.
11 And by the time we were back in Atlanta, we had
12 gone from me, [REDACTED], and [REDACTED] to just me and
13 [REDACTED] pretty quickly.

14 Q. What happened to [REDACTED]?

15 A. I'm not sure.

16 Q. Do you think she escaped?

17 A. I really don't know.

18 Q. Okay. So tell me about Bagz. Once you --
19 You said that you thought Bagz would be a nicer
20 pimp, right?

21 A. Yes.

22 Q. And did Bagz turn out to be a nicer pimp
23 than Bless?

24 A. For the first, like, week or so, yes. It
25 seemed that way.

1 Q. Did you have sex with him the first week?

2 A. Yes.

3 Q. And was that voluntary?

4 A. As I said before, it was basically
5 understood that you had to do that. You didn't
6 really have a say in that matter, because you were
7 basically their property.

8 Q. But he didn't force or threaten you in any
9 ways, right?

10 A. Not at this time, no.

11 Q. And when was the first -- So when you got
12 back, which hotel did you get back to?

13 A. In Atlanta? When we first got back,
14 that's when we went to that apartment that was
15 shown because Bagz needed to get some clothes and
16 stuff. And we -- [REDACTED] and I actually did fall
17 asleep there on a chair, because I believe after
18 Bagz got some of the belongings he needed, he went
19 somewhere and told us to stay put until he got
20 back. And then I don't think he got back till the
21 morning, and so I think [REDACTED] and I fell asleep on
22 a chair because there was nowhere else to sleep for
23 us in the living room.

24 Q. And did you guys go to a hotel afterwards
25 to resume the commercial sex?

1 A. Yes.

2 Q. Was that at -- Which hotel was that?

3 A. It's hard to remember what order certain
4 hotels were, because we were in and out of hotels
5 constantly from this point till the very end of my
6 stay in Georgia.

7 Q. Okay. And I want to ask you a specific
8 question about it. Do you recall when the first
9 time that you stayed at the Red Roof North Druid
10 Hills was?

11 A. I believe it was sometime maybe late
12 November, because we --

13 Q. 2010?

14 A. Yes. 2010. We had gone on another little
15 quick trip out of town, just [REDACTED] and I, maybe, I
16 would say, at the end of October. And then at that
17 time, she had come up with this plan to escape, and
18 she had -- she had left. And then I ended up
19 coming back alone to Georgia.

20 Q. So [REDACTED] had a plan to escape, and she
21 did escape sometime in November 2010?

22 A. Yes.

23 Q. Did she ask you to go with her?

24 A. Yes.

25 Q. You said no?

1 A. I -- I didn't think that it was that bad
2 at the time.

3 Q. Okay. So you didn't go with [REDACTED] not
4 because you were scared; you just thought it was
5 fine doing commercial sex with Bagz, right?

6 A. Well, not necessarily. I was still very
7 scared of Bagz. He's 20 times scarier than Bless
8 ever was, and he didn't even have to try at first.
9 But I had also seen the pattern now of how the
10 pimps operated and how scary that they were. So
11 that fear was already instilled and just became
12 more and more as time went on. So yes, I was still
13 afraid.

14 Q. Had Bagz -- At the time [REDACTED] escaped,
15 had Bagz been physically abusive to you?

16 A. No. Not yet.

17 Q. And at the time that [REDACTED] escaped, had
18 Bagz threatened you in any ways by that -- up to
19 that time?

20 A. Briefly, yes. Part of [REDACTED] plan when
21 we were out of town -- We went out of town to North
22 Carolina, and in the middle of the night instead of
23 staying in North Carolina, she said let's go to New
24 York. And I trusted her because from what it
25 looked like, it looked like Bagz really held her on

1 a pedestal. It seemed that way. So I thought
2 maybe -- I didn't think that it was going to get us
3 in trouble. I thought -- Just the way she made it
4 sound is that we're not going to tell him yet.
5 We're going to surprise him that we're going here.

6 And then once we were there, I spoke
7 to him. And when he found out that we were there,
8 he did get very angry and aggressive and scary.
9 But I think he sensed that, because I was so new to
10 him, that if he was too angry and aggressive that I
11 would be more apt to be able to escape with [REDACTED].
12 And so he started using very manipulative mind
13 games on me and used that more to get me back than
14 the aggressive approach.

15 Q. Okay. So he didn't threaten you. You're
16 saying he used manipulative ways?

17 A. At first he did, and then he changed his
18 way of manipulating.

19 Q. How did he threaten you?

20 A. He said something along the lines of he's
21 going to -- He would use a lot of degrading words
22 when he talked to -- Like, when he got angry, he
23 would use very degrading words, and he would say
24 I'm going to -- I'm going to -- I can't remember
25 exactly verbatim what he would say, but along the

1 lines of "I'm going to beat you."

2 Q. Okay.

3 MS. MYKKELTVEDT: Were you finished?

4 BY MR. ALLUSHI:

5 Q. Yeah. Are you finished?

6 A. No. No.

7 Q. Okay. Go ahead. Sorry.

8 A. That's okay. He would say things like
9 "I'm going to beat you." And he would, like,
10 really degrade us like saying things, "I'm going to
11 beat you," like, "dirty whores," and stuff like
12 that, and -- I don't know. I don't know how to
13 explain it. But it would make us feel really low,
14 and then he would flip it, and it's -- For my naive
15 mind back then, it was a lot to comprehend. So
16 when he would flip it and he would start being
17 really, really nice, I almost, like, tried to cling
18 onto that. And that's what he used specifically to
19 get me back from New York instead of letting me
20 escape with [REDACTED] at the time.

21 Q. Are you finished?

22 A. Yes.

23 Q. Okay. So let me just understand this a
24 little bit, [REDACTED]. So you and [REDACTED] were
25 in North Carolina by yourself, the two of you, and

1 confusing, and I didn't realize that. We lost the
2 car, and all of our luggage and stuff was in it,
3 and so we didn't have any clothes or anything like
4 that. So that's -- We were -- We didn't have
5 anything. So I think we maybe bought an outfit
6 each, and I'm sure we bought food at some point.
7 We'd have to eat at some point. And then anything
8 else I had, I brought it back to him when I did
9 arrive back in Atlanta.

10 Q. Well, how did Bagz know how much money you
11 made each day and how much money you used for food,
12 for gas, for things like that? Did you-all keep a
13 log of them, or did you-all keep like receipts for
14 everything and he demanded receipts? I'm just
15 trying to understand how that worked out.

16 A. So, besides this trip in particular,
17 because this trip obviously wasn't how things went
18 usually, but we would have a daily quota. And we
19 would talk to Bagz throughout the day, many times
20 throughout the day to check in and to let him know
21 when we were going to get food and let him know
22 that we were going -- when we were going to pay for
23 the hotel. These were all things that were
24 required of us.

25 And even after paying for our food and

1 our hotel, our quota was still a certain number.
2 So we'd have to make our quota then plus enough
3 food for ourselves to eat or get a room.
4 Otherwise, we would get beaten up.

5 Q. But my question was he didn't ask you for
6 receipts on food or receipts for gas or receipts
7 for toiletries or receipts for the dresses you said
8 you bought, right? Did he ask you for those
9 receipts?

10 A. I didn't buy dresses. I don't know what
11 you're referring to.

12 Q. Okay. Strike the dresses. Did he ask you
13 for receipts for food that you bought, for gas that
14 you bought, for toiletries that you bought?

15 A. In general or on this specific trip?

16 Q. On this specific trip.

17 A. On this specific trip his only concern was
18 getting me back to him.

19 Q. Okay.

20 A. That was his only concern.

21 MR. ALLUSHI: Objection,
22 nonresponsiveness.

23 Q. (By Mr. Allushi) My question was for the
24 things that you bought on this trip, [REDACTED],
25 did he ask you for receipts for these specific

1 here, you stayed at the Red Roof North Druid Hills
2 25 times, right, approximately?

3 A. That's very possible. Yes.

4 Q. Okay. Do you recall -- That's what you
5 put in the -- You can review your testimony here on
6 these, if you'd like. If you go to page -- Do you
7 see page 32?

8 A. Yes.

9 Q. And it says Red -- And that's -- It says
10 "Plaintiff further provides the following details
11 relating to her --

12 MR. ALLUSHI: Sorry. I'm reading fast
13 again.

14 Q. (By Mr. Allushi) "Plaintiff further
15 provides the following details relating to her
16 trafficking at specific hotels relevant to this
17 action about which R.K. has specific recollection."
18 And it says "Red Roof Inn North Druid Hills." And
19 it says "R.K. believes the first time she was at
20 this hotel is in late September 2009."

21 Now, that is incorrect, right? We've
22 established here today that the first time you
23 stayed at the Red Roof Inn North Druid Hills is
24 November 2010, correct?

25 A. Yes. That sounds more right.

1 Q. Okay. We've established that today here
2 from testimony in documents, right?

3 A. Yes.

4 Q. Okay. And then it says "Her trafficker at
5 that time" was Bagz, "would have been Bagz,"
6 correct?

7 A. Yes.

8 Q. "Over the course of her trafficking, R.K.
9 estimated that she was at this hotel up to 25
10 times," correct?

11 A. Yes. That's accurate.

12 Q. So maximum of 25 times, right, over the
13 two years and a half?

14 MS. MYKKELTVEDT: Object to the form.

15 Q. (By Mr. Allushi) It says up to 25 times.
16 Did I read that correct?

17 A. Well, it says up to 25 times, but it's
18 more ballpark.

19 Q. Okay. Well, that's what that says there,
20 right?

21 A. That's what it says there, but --

22 Q. And you wrote that, right?

23 A. No. I did not write that.

24 Q. You told that to your attorneys, right?

25 A. I think what we -- What I meant was that

1 it's more of a ballpark around 25 times.

2 Q. Okay.

3 A. It's hard to be exact.

4 Q. And I understand that and appreciate that,
5 [REDACTED]. But this says -- Under oath you
6 signed this document saying that these are true and
7 correct representations. You understand that?

8 A. Well --

9 Q. Is that a yes?

10 A. I don't know.

11 Q. Do you understand that you signed the
12 document saying that this document contains true
13 and accurate representations of these answers?
14 I'm not trying to trick you. I'm just asking if
15 you understand that.

16 A. I'm not sure.

17 Q. Okay. So you don't know if that
18 Verification we discussed earlier, you didn't
19 understand what that meant when you signed it where
20 it says under penalty of perjury you're signing
21 these to be true and correct?

22 A. Well, I understood that there might be a
23 couple of typos in there.

24 Q. Okay. And do you think this is a typo
25 here?

1 A. I mean, basically, yes.

2 Q. So you think it was more than 25 times
3 now?

4 A. I think it's ballpark around 25 times.

5 Q. Okay.

6 A. It could be more than 25 times.

7 Q. And it could be less, right?

8 A. Yes. It could be less. It could be more.
9 That's why around 25.

10 Q. Understand. And then it says each stay at
11 the hotel was usually three to five days at a time;
12 is that accurate?

13 A. Yes.

14 Q. To the best of your recollection?

15 A. Yes.

16 Q. And it says this was one of the most
17 frequented hotels by your trafficker, which is --
18 is that Bagz?

19 A. Yes.

20 Q. And what were some of the other hotels
21 that were the most -- Because it says one of the
22 most. Which one are the others?

23 A. Really any of the Extended Stays, we
24 rotated through those pretty often. The Hampton
25 Inn right across the street from this one.

1 Q. Okay. Did you understand -- Do you know
2 what prostitution is? Do you know what the legal
3 definition in Georgia of prostitution is?

4 A. I do not.

5 Q. Okay. Let me read it to you. OCGA 16-6-9
6 says "A person 18 years or older of age commits the
7 offense of prostitution when he or she performs or
8 offers or consents to perform a sexual act
9 including but not" -- "but not limited to sexual
10 intercourse or sodomy for money and other items of
11 value." Were you doing that?

12 A. I wouldn't consider what I was doing to
13 fit that exactly, because I did not have the
14 ability to say no, and I did not keep any of my
15 money, so I don't think it fits that definition
16 exactly.

17 Q. Okay. But did this definition I just read
18 you say anything about ability to keep money or
19 ability to say no?

20 A. It did say consent.

21 Q. Let me read it again. "A person 18 years
22 of age or older commits the offense of prostitution
23 when he or she performs," is first, "or offers," is
24 second, "or consents to perform a sexual act,"
25 right? There's three different -- "including but

1 not limited to sexual intercourse or sodomy for
2 money or other items of value." So you did perform
3 sexual intercourse in exchange for items of value,
4 correct?

5 A. It's just not the term that I would have
6 used for what was happening.

7 MR. ALLUSHI: Objection,
8 nonresponsiveness.

9 Q. (By Mr. Allushi) I understand that. And
10 you can certainly answer and describe whichever way
11 you'd like, [REDACTED]. My question was: You
12 did perform sexual intercourse in exchange for
13 items of value, money, correct?

14 A. Yes. If I chose not to, then I would be
15 beaten up by Bagz.

16 Q. Did you know at the time that it was
17 illegal to perform acts of sexual intercourse in
18 exchange for items or value like money?

19 A. Yes, but I was more afraid of Bagz than
20 the police.

21 Q. The first time you were at the Red Roof
22 Inn -- Any of the 25 times, approximately, you
23 stayed at the Red Roof Inn North Druid Hills, was
24 -- any of that time the room was under your name?

25 A. No.

1 Q. Do you know whose name it would have been?

2 A. Well, it was possible it was under
3 whatever ID Bagz was using. Also, if [REDACTED] had
4 an ID, it may have been under her name. But I
5 don't know if you can get a hotel room under 17. I
6 don't know if that's legal.

7 Q. Well, [REDACTED] testified yesterday that she
8 never rented a room at the North Druid Hills hotel
9 in her name. Do you have any reason to dispute
10 that?

11 A. Not necessarily. But what I'm going off
12 is Bagz, when we would have multiple girls, he'd
13 have -- sometimes have the room put under the other
14 girls' names. And I was never one of those because
15 I never had an ID except for the brief time that I
16 had the fake ID.

17 Q. Okay. As you sit here today, do you have
18 any evidence that you stayed 25 times at the Red
19 Roof North Druid Hills? And by evidence, I mean,
20 do you have any documents, any folios, any
21 receipts, any receipts from vending machines, any
22 receipts from buying anything there or doing
23 anything there? Do you have anything like that?

24 MS. MYKKELTVEDT: Object to the form.
25 Go ahead.

1 THE WITNESS: I don't have any
2 physical evidence. I don't have anything at all
3 from my time in Georgia. I mean, obviously,
4 besides these documents. But I never -- I didn't
5 keep anything from Georgia when I got out of
6 prison.

7 Q. (By Mr. Allushi) Let me -- Let me
8 rephrase that question, [REDACTED], because your
9 lawyer objected.

10 Do you have any written documentation
11 in your possession showing that you stayed at the
12 Red Roof North Druid Hills ever?

13 A. Not that I know of. Not any physical --
14 Not anything physical.

15 MR. ALLUSHI: Let's take a quick
16 break. He needs to change the video.

17 THE VIDEOGRAPHER: We're going off the
18 record at 4:50 p.m.

19 (Off record 4:50 - 4:59.)

20 THE VIDEOGRAPHER: We are going back
21 on the record at 4:59 p.m.

22 Q. (By Mr. Allushi) [REDACTED] we're
23 back from a quick break. We were talking about
24 your stays at the Red Roof North Druid Hills.

25 And during your stays at the Red Roof

1 North Druid Hills, your alleged stays there, did
2 you ever speak to any employees?

3 A. Yes.

4 Q. Who?

5 A. Often the front desk people. We would go
6 downstairs and pay for our rooms each day, pay for
7 another stay in the hotel. And we would have to go
8 -- either go down there or call down, but often we
9 would go down there and ask for towels. We had to
10 get a lot of, like, towels throughout the day for
11 when we were seeing customers to clean up and
12 everything.

13 And -- And then anytime the -- the
14 ladies would go by with their carts, we'd ask for a
15 bunch of towels and stuff, too. But they were only
16 doing that a certain time every day, so if it was
17 past that time and we needed towels, we'd go down
18 to the front desk and ask them.

19 Q. And this was the same type of procedure in
20 all these hotels you stayed, right? You'd do the
21 same thing, right?

22 A. Yes.

23 Q. All of the dozen brands that we talked
24 about, correct?

25 A. Yes.

1 Q. And do you recall any names specifically
2 of employees at the Red Roof North Druid Hills?

3 A. No.

4 Q. And do you -- Did you ever tell anyone at
5 the Red Roof North Druid Hills that you were being
6 held against your will?

7 A. No. I did not. They were all, like,
8 connected to Bagz or, you know, other pimps, but
9 Bagz was -- like knew them. He was friendly with
10 them. So no, I didn't -- I didn't think they would
11 help us. I thought if I asked for help from them,
12 they'd surely tell Bagz and then I'd get beaten up.

13 Q. And how do you know they were connected to
14 Bagz?

15 A. Because we only went to hotels
16 specifically if the pimps felt comfortable taking
17 us there, meaning they knew they wouldn't get in
18 trouble for taking us to certain hotels.

19 MR. ALLUSHI: Objection,
20 nonresponsiveness.

21 Q. (By Mr. Allushi) My question is how do
22 you know, [REDACTED], that Bagz was connected to
23 the Red Roof employees? Did he tell you? Did
24 somebody else tell you? That's what I'm trying to
25 understand.

1 A. I'm sure he did say -- say something along
2 those lines. But also just by the way that they
3 would act at these hotels. For example, in hotels
4 that he wasn't necessarily super comfortable in, he
5 wouldn't even get out of the car. He wouldn't go
6 inside unless, you know, maybe by himself.

7 But in these hotels, Red Roof Inn and
8 many of the other ones mentioned, he -- he would
9 not only go inside and pay for the room when we'd
10 first get to the hotel, but he would hang out in
11 the parking lots of these hotels with other pimps.
12 And a lot of times he would sit in the parking lot
13 and smoke with some of the girls, especially
14 specifically at this Red Roof Inn sometimes.

15 Q. And you're saying based on those
16 observations you just described, that's how you
17 concluded that he was connected at the hotels,
18 right?

19 A. Yes, his comfortability at those hotels.

20 Q. But you never witnessed him discuss
21 anything with the employees at North Druid Hills,
22 correct?

23 A. Yes, I did.

24 Q. What was he discussing?

25 A. I've seen him go into hotels and just,

1 like, chat with them as if he knew them. And his
2 comfortability with the employees -- it was very
3 obvious that he was comfortable with them.

4 Q. But again, that was just an observation,
5 right? You didn't hear what the -- the substance
6 of the conversation, did you?

7 A. What was the original question?

8 Q. At the North Druid Hills hotel, did you
9 ever hear what the substance of any conversations
10 between Bagz and employees were?

11 A. Yeah. I did hear -- I mean, sometimes
12 like when he'd go in, he would, you know, be very
13 friendly with them when, like, getting the room.
14 And he would just speak like he's speaking to a
15 friend or someone he knew, very familiar with.

16 Q. Okay. But did he -- Did you ever hear him
17 specifically say I'm a pimp and these girls are
18 working and appreciate you guys letting us stay
19 here?

20 A. I've heard him say "appreciate you guys,"
21 almost exactly that verbatim.

22 Q. Okay.

23 A. But he didn't need to state the other
24 stuff, because when we would -- It was very obvious
25 that he was a pimp and we were his, the way we were

1 to follow behind him and walk with our heads down
2 and bring our money downstairs while he waited
3 downstairs.

4 Q. It was obvious to you, though, right? Or
5 it should have been obvious to anybody, according
6 to your testimony?

7 A. It should have been obvious to the
8 employees that worked there to look out for
9 something like that.

10 Q. Okay. To look out for somebody just
11 having girls follow him around and pay cash, right?

12 A. For girls that looked like they were being
13 trafficked.

14 Q. And what do girls that were being
15 trafficked look like?

16 A. Very submissive and -- Very submissive to
17 a man and usually multiple girls with a man, or it
18 could be even just one, but very, very submissive
19 and running money down from upstairs to hand to a
20 man. And just signs of someone being trafficked is
21 -- besides that would be getting towels multiple
22 times a day, being dressed up to linger around a
23 hotel room, paying cash every day to renew the
24 room. Those would be signs, I would say, to look
25 for if you're looking for signs for trafficking

1 victim.

2 Q. I understand -- I'm sorry. Are you
3 finished?

4 A. I'm done.

5 Q. Okay. I understand you understand that
6 now. You filed a lawsuit alleging these things.
7 But earlier you told me you didn't know what
8 trafficking was at the time, right?

9 A. No, I did not.

10 Q. Okay. But you expected the hotel to know
11 at the time?

12 A. I expect, yeah, the hotel to know better.

13 Q. And you think that somebody that has a
14 submissive girl with him, that should have been a
15 sign?

16 A. It should have been looked into, at least.
17 And if they had any suspicion, then they should
18 turn it away or call the police.

19 Q. And you don't think that there is plenty
20 of relationships where a woman is submissive to a
21 man that go and stay at a hotel?

22 A. That's possible. But it should raise some
23 concern at a hotel specifically.

24 Q. So every time a hotel employee sees a
25 woman that's submissive and pays cash, runs down

1 A. Probably.

2 Q. Okay. Then you went back to Georgia, back
3 to Bagz, right?

4 A. Well, in this particular instance he
5 picked me up from jail.

6 Q. So he came to Tennessee to pick you up?

7 A. Yes.

8 Q. But when you were in Tennessee alone, you
9 didn't escape or anything?

10 A. No. I was too afraid. I wasn't going to
11 try it. I knew what would happen if I tried and
12 failed.

13 Q. Did Bagz ever beat you up?

14 A. Very often. Yes, he did.

15 Q. Okay. And how often?

16 A. Monthly. Weekly sometimes. It honestly
17 just depended.

18 Q. And were you placed on probation after
19 this arrest here?

20 A. I don't remember.

21 Q. Okay. I think it says here. Do you see
22 where it says "appearance details"? Do you see
23 that paragraph?

24 A. Yes.

25 Q. It says you showed up in court on -- This

W.K., et al v. Red Roof Inns, Inc., et al

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B.,)
D.P., A.F., C.A., R.K., K.P.,)
and T.H.,)
Plaintiffs,)

V.) CIVIL ACTION NO:
) 1:20-CV-05263-VMC

RED ROOF INNS, INC., et al.,)
Defendants.)

* * * * *

JANE DOE 1-4,)
Plaintiffs,)

V.) CIVIL ACTION NO.
) 1:21-CV-04278-WMR

RED ROOF INNS, INC., et al.,)
Defendants.)

* * * * *

REPORTER'S CERTIFICATION
VIDEOTAPED ORAL DEPOSITION OF [REDACTED]
May 6, 2022

I, Julie W. Greene, Certified Shorthand
Reporter in the State of Texas, do hereby certify
to the following:

That the witness, [REDACTED], was duly
sworn by the officer and that the transcript of the
oral deposition is a true record of the testimony
given by the witness;

I further certify that pursuant to FRCP Rule
30(e)(1) that the signature of the deponent was
requested by the deponent or a party before the
completion of the deposition; that the deposition
transcript was submitted on May 25, 2022, to the
witness or to the attorney for witness for
examination, signature, and return to Veritext
Legal Solutions by 30 days from receipt of transcript;

That the amount of time used by each party at
the deposition is as follows:

ADI ALLUSHI: 8 hours, 32 minutes
TIANA MYKKELTVEDT: 0 hours, 00 minutes
ELLIOTT REAM: 0 hours, 00 minutes

1 That pursuant to information given to the
2 deposition officer at the time said testimony was
3 taken, the following includes counsel for all
4 parties of record:

5 FOR THE PLAINTIFFS:

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1 I further certify that I am neither counsel
2 for, related to, nor employed by any of the parties
3 in the action in which this proceeding was taken,
4 and further, that I am not financially or otherwise
5 interested in the outcome of the action.

6 Certified to by me on May 25, 2022.

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Julie W. Greene, CSR #2847
Expiration Date: 07/31/23

Job No. 5213695